

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JEANETTE MELLERSON	)	
	)	
	)	
Plaintiff,	)	Civil Action No.: L-01-2090
	)	
v.	)	
	)	
JOANNE B. BARNHART,	)	
Commissioner	)	
Social Security Administration	)	
	)	
Defendant.	)	

\* \* \* \* \*

**DECLARATION OF SUSAN E. HUHTA**

I, Susan E. Huhta, hereby declare as follows:

Supplemental Legal Services Provided By  
The Washington Lawyers' Committee for Civil Rights & Urban Affairs

1. I incorporate the information set forth in my initial declaration filed in support of Plaintiff's Petition for attorney's fees and costs on November 14, 2003, in support of this Supplemental Petition for an Award of Attorneys' Fees and Costs.

2. In my role as the EEO Project Director at the Washington Lawyers' Committee for Civil Rights & Urban Affairs ("the Committee"), I am the senior litigation attorney from the Committee working on the above-captioned matter, and in that capacity, I developed the strategy for responding to Defendant's Opposition to Plaintiff's Petition for Attorneys' Fees and Costs; supervised the initial drafting of Plaintiff's reply

brief, including editing the reply brief; and made final determinations for the Committee as to the form and substance of the reply brief.


3. In Ms. Carolyn Weiss's role as the EEO Staff Attorney with day-to-day responsibility for litigating the Mellerson matter, Ms. Weiss researched and prepared the initial draft of Plaintiff's reply brief, and further prepared revisions to the draft and performed supplemental research consistent with the edits, comments and strategic direction she received from me and attorneys at Piper Rudnick, along with coordinating with co-counsel.

4. The Committee is seeking compensation for a total of 2 hours of my time expended on preparing the reply brief, which is valued at \$540.00 (\$270/hr. *Laffey* rate), and a total of 4 hours, 48 minutes of Ms. Weiss's time expended on preparing the Reply brief, which is valued at \$1056.00 (\$220/hr. *Laffey* rate). Thus, the Committee is seeking compensation for time valued at \$1,596.00 for its work performed on the reply brief. Contemporaneous billing records reflecting the time expended on the reply brief for which compensation is sought are included in Exhibit F.

5. The fees for which the Committee is not seeking reimbursement total \$1,773.00. Some of the time expended by the Committee for which compensation is not sought represents time expended on research and editing; certain time devoted to intra-office and inter-office collaboration; and time expended in the preparation of Plaintiff's supplemental fee petition. Contemporaneous billing records reflecting the time expended on the reply brief for which compensation is not sought are included in Exhibit G.

6. In the further exercise of billing judgment, the Committee is reducing the amount for which it seeks compensation (valued at \$1,596.00) by 20% (\$319.20) to ensure that the requested fee total represents a truly conservative calculation of the time spent working on the reply brief and to ensure that the supplemental fee petition cannot be criticized for inadvertently including time that is unnecessary or duplicative. Therefore, the total fees claimed by the Committee with respect to the drafting and preparation of the reply brief are \$1,276.80.

**I HEREBY DECLARE AND AFFIRM UNDER PENALTY OF PERJURY THAT THE FOREGOING STATEMENTS CONTAINED IN THIS AFFIDAVIT ARE TRUE AND CORRECT.**

  
Susan E. Huhta

1/22/4  
Date